



Federation of the European
Sporting Goods Industry

FESI internal FAQ

PPWR implementation - clarified questions

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Introduction

Following the FESI x PSL webinar on 6 October 2026, FESI reviewed the PPWR implementation questions previously collected from members. The points below capture the questions that were sufficiently clarified during the webinar and can therefore support members' implementation work. Issues that remain unclear or only partially clarified are contained in a separate document for the European Commission.

Roles and responsibilities

What is the difference between the PPWR “manufacturer” and the EPR “producer”?

Answer:

They are separate legal roles. The manufacturer is responsible for packaging conformity, including the conformity assessment, technical documentation, Declaration of Conformity (DoC) and Article 15 identification. The EPR producer is responsible for packaging-waste obligations in the relevant Member State, including registration, reporting and EPR financing. The same company can perform both roles, but each role should be assessed separately.

Who is normally the PPWR manufacturer for branded, custom and standard packaging?

Answer:

For branded packaging commissioned under a company's own name or trademark, that company will normally be the manufacturer. For custom unbranded packaging, the company commissioning the packaging and determining the design/specifications can also be the manufacturer. For standard unbranded sales packaging, the filler/packer may be the manufacturer unless another operator commissions the packaged product under its own name or trademark. For standard unbranded transport packaging, the packaging supplier physically manufacturing the standard item will normally be the manufacturer.

Shared-control, non-EU and unusual contractual arrangements remain case-specific and are retained in the Commission questions.

How should the manufacturer be identified in licensing arrangements?

Answer:

The manufacturer role generally follows the operator that actually controls the packaging design and specifications. Depending on the arrangement, this can be the brand owner, the licensee or the licensor. Contracts and actual decision rights should be checked, especially who determines dimensions, materials and execution.

Who is the EPR producer in a cross-border B2B or direct-to-consumer sale?**Answer:**

The answer follows the actual supply route in the destination Member State. Where a local subsidiary or retailer purchases and resells the packaged goods, that local entity will generally be the EPR producer. Where the company established in another Member State sells directly to end users, the cross-border seller remains the EPR producer, subject where applicable to authorised-representative requirements.

FESI should still raise national divergence and authorised-representative implementation, rather than the basic supply-route logic itself.

Declaration of Conformity and technical documentation

Who issues and signs the PPWR Declaration of Conformity?**Answer:**

The PPWR manufacturer reviews the evidence against the applicable requirements, resolves gaps, compiles the technical file, issues and signs the DoC, and retains the records. Packaging and material suppliers provide the technical evidence needed for that assessment; they do not automatically become responsible for issuing the brand's DoC.

Can one DoC cover several packaging variants or IDs?**Answer:**

Yes, where the variants are technically equivalent for the applicable PPWR requirements. For example, one shoebox DoC can cover several colours or print variants when the material, dimensions and construction are the same, provided the individual IDs are listed in a controlled annex or record linked to the DoC. A materially different feature or construction requires reassessment and may require a separate DoC.

Can one DoC cover different sizes of otherwise identical packaging?**Answer:**

For the requirements applicable in 2026, this can be possible where size does not affect compliance. However, future requirements - notably Article 10 minimisation from 2030 - may make size relevant and could require separate assessments. Companies may therefore choose a more granular DoC structure now to avoid later restructuring.

Can one DoC cover several components of one packaging unit?**Answer:**

Yes, where the components form one packaging unit and the evidence covers the full configuration. The webinar examples included a shoebox plus protective tissue, a hangtag card plus plastic swift tag, and potentially a swim-goggle retail pack. Components with materially different packaging functions, such as a garment polybag and an outer shipping carton, should generally be assessed separately.

What should a manufacturer do when supplier evidence is incomplete?

Answer:

The manufacturer remains responsible for establishing conformity. It should identify the precise gap, request or review upstream evidence and, where necessary, carry out its own assessment or targeted testing. If the evidence cannot demonstrate conformity, the manufacturer should not sign the DoC or release the affected packaging for first supply. Special stock-relief considerations may apply to packaging manufactured before 12 August 2026, but ordinary post-application production requires the full evidence needed for conformity.

Timing and minimisation

Does the PPWR DoC need to demonstrate Article 10 packaging minimisation already in 2026?

Answer:

No. Article 10 design minimisation enters the PPWR conformity assessment and DoC from 1 January 2030. Until the end of 2029, the existing Packaging Directive minimisation requirement continues to apply; the webinar identified EN 13428 as the relevant assessment route. FESI therefore does not need to ask the Commission whether Article 10 evidence must already be included in a PPWR DoC before 2030.

Which PPWR sustainability requirements are relevant to a DoC signed today?

Answer:

The webinar identified the requirements already applicable from August 2026 as including Article 5 substance restrictions and, where relevant, Article 11 reusable-packaging requirements. Recyclability, recycled-content and Article 10 minimisation requirements enter later, subject to the dates and secondary legislation set by the PPWR.

Article 15 identification and labelling

What kind of packaging identifier is required under Article 15(5)?

Answer:

A type, batch or serial number, or another identifier that reliably links the packaging to the correct specification, DoC and technical file. A unique serial number for every individual packaging item is not generally necessary; a type or batch reference can be sufficient.

Must the same identifier be repeated on every component of a packaging unit?

Answer:

Not necessarily. Where components form one packaging unit and are fully traceable in the supporting records, the identifier can appear on the principal component. In the webinar example, the shoebox identifier could cover both the box and its loose protective tissue, provided the records identify the tissue specification as part of that configuration.

Can PPWR and GPSR manufacturer contact information be shared?

Answer:

Yes, where the same legal entity is responsible under both regimes and the applicable placement rules are met. The webinar also indicated that PPWR does not prescribe headings such as “product manufacturer” or “packaging manufacturer”. Sharing contact details does not remove the need for each product/package object to remain traceable to the relevant records.

Can Article 15 information be provided through a QR code or accompanying document?

Answer:

Manufacturer contact information may be provided on the packaging or through a QR/data carrier where the PPWR conditions are met. Where the size or nature of the packaging prevents the required marking, an accompanying document can be used as the permitted fallback. For the packaging identifier itself, an accompanying document is likewise possible where size or nature prevents marking on the packaging.

Importer and distributor duties

Does a distributor or retailer have to obtain and keep a copy of every PPWR DoC?

Answer:

The webinar indicated that distributors/retailers do not have a general DoC-retention duty. Their role is to check the required identification and labelling and relevant EPR registration. Detailed conformity documentation can be managed on a restricted or as-needed basis and made available to authorities where required.

What is expected from an importer?

Answer:

Where relevant, the importer verifies compliance, keeps a copy of the DoC and ensures access to the technical file for authorities. This is a stronger documentation role than that of an ordinary distributor/retailer.

How quickly must the relevant documents be available to authorities?

Answer:

The webinar indicated that the DoC and relevant technical documentation must be capable of being provided to the competent authority within 10 days of a request.

Existing stock and the 12 August 2026 transition

What matters for determining whether existing stock needs a PPWR DoC or relabelling?

Answer:

The key point is when the packaging was placed on the EU market, assessed according to the supply route. Packaging already placed on the market before 12 August 2026 does not require a retrospective PPWR DoC or relabelling.

What if packaging was manufactured before 12 August 2026 but placed on the market afterwards?

Answer:

A PPWR DoC is required. The webinar explained that stock-relief measures may apply to identification and certain supplier-data gaps, but the applicable substance limits continue to apply in full.

Does stock physically remaining at a supplier automatically count as not placed on the market?

Answer:

No. Storage location alone is not decisive. For EU supply, the first qualifying supply after the manufacturing stage is complete must be identified; depending on the agreement, supply can occur before physical delivery. For imports, customs declaration/release for free circulation and the underlying supply are key evidence.

What evidence should be retained for pre-12 August stock?

Answer:

Dated supply records linked to the relevant lot should be retained for EU supply; for imports, customs declaration and release records should be linked to the lot. Where there is no dated record supporting an earlier placement or production date, the webinar recommended treating the stock conservatively as post-12 August.

Source basis:

FESI x PSL webinar and presentation, 6 October 2026, together with the Commission FAQs and guidance referenced during that webinar. Points that remain genuinely unresolved are separated into the companion Commission-questions document.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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